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September 27, 2012

VIA CM/ECF

The Honorable Joseph E. Irenas, S.U.S.D.J.
United States District Court for the District of New Jersey
Mitchell H. Cohen Federal Building & U.S. Courthouse
1 John F. Gerry Plaza, Room 310
Camden, NJ 08101

**Re: Brady, et al v. Air Line Pilots Association, Int'l
Civil Action No. 02-2917 (D.N.J. Camden) (JEI)
Response to Plaintiffs' September 27, 2012 Request for
Continuance of Service of Expert Reports**

Dear Judge Irenas:

On behalf of defendant Air Line Pilots Association, International (“ALPA”), I am writing in response to plaintiffs’ September 27, 2012 request for a continuance of the date of service of the reports of plaintiffs’ damages experts, relative to this matter. That date is currently set for September 28, 2012, under the terms of the September 7, 2012 Case Management Order.

Defendant ALPA does not object to a continuance of the service of plaintiffs’ expert reports until Friday, October 12, as proposed by plaintiffs. Under these circumstances, defendant would respectfully request the following:

- (1) That the currently scheduled October 2 in-person court conference, set by the September 7, 2012 Case Management Order, also be briefly continued. All counsel are available on Monday, October 22, for a re-scheduled in-person court conference, subject to Your Honor’s availability.
- (2) That the depositions of the five (5) current or former American Airlines/Allied Pilots Association deponents, likewise be briefly continued. Under the September 7, 2012 Case Management Order, those depositions were to be completed by October 10 following service of the reports of plaintiffs’ damages experts. If continued, these depositions can be re-scheduled to occur after the new in-person court conference.

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We have conferred with plaintiffs' counsel who consents to these proposed continuances. We appreciate Your Honor's consideration of these scheduling adjustments. If you have any questions, please call me.

Thank you.

Respectfully submitted,

/s/ John C. Connell

JOHN C. CONNELL

JCC/jcw

cc: Allen Press, Esquire (via CM/ECF only)
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